

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

PEIQING CONG, <i>et. al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	CIVIL ACTION NO. 4:12-CV-01976
v.	§	
	§	
CONOCOPHILLIPS COMPANY,	§	JURY TRIAL DEMANDED
Defendant.	§	
	§	

**ConocoPhillips Company's Appendix Supporting its Motion to Dismiss and Brief**

Defendant ConocoPhillips Company ("ConocoPhillips") files this appendix of exhibits in support of its motion to dismiss (D.E. 10) and brief (D.E. 11). Attached to this appendix, and incorporated fully by reference herein, are true and correct copies of the following exhibits:

Exhibit	Document description
<b>A</b>	<b>Declaration of Sean Grimsley of Bartlit Beck Herman Palenchar &amp; Scott LLP, one of the attorneys representing ConocoPhillips Company in this lawsuit.</b>
A1	The first five pages of ConocoPhillips Company's Form 10-K for the fiscal year ending December 31, 2011
A2	Chinese National Offshore Oil Corporation ("CNOOC") Company Overview on CNOOC English Website
A3	Accident Investigation and Settlement Report of June 21, 2012 from the State Oceanic Administration of the People's Republic of China
A4	English Translation of Exhibit A3, the Accident Investigation and Settlement Report of June 21, 2012 from the State Oceanic Administration of the People's Republic of China
A5	English translation of Tianjin Fishermen Complaint, attached as Exhibit 1 to the Declaration of Graham W. C. Vanhegan

A6	China Daily Article, “Fishermen’s oil-leak suit accepted by Tianjin court,” of December 14, 2011
<b>B</b>	<b>Declaration of Graham W. C. Vanhegan, Deputy General Counsel, Corporate and Chief Compliance Officer, ConocoPhillips Company</b>
B1	Complaint filed in the Tianjin Court in the People’s Republic of China by fisherman in Tianjin and the Court’s statement that it accepted the case, provided to ConocoPhillips China by the Court
<b>C</b>	<b>Declaration of Xiaoyang Li and Changyu Fu, senior partners of the Jun He Law Offices, a leading and prominent firm in the People’s Republic of China.</b>
C1	People’s Republic of China <i>General Principles of Civil Law</i> (English Translation from Thomson Reuters)
C2	<i>Law of the People’s Republic of China on Application of Laws to Foreign-Related Civil Relations</i> (English translation from Thomson Reuters)
C3	<i>Organic Law of the People’s Courts of PRC</i> (English translation by the General Office of Legislative Affairs Commission, The Standing Committee of the National People’s Congress)
C4	People’s Republic of China <i>Civil Procedure Law</i> (English translation by the General Office of Legislative Affairs Commission, The Standing Committee of the National People’s Congress)
C5	<i>Decision of the Standing Committee of the National People’s Congress on the Establishment of Maritime Courts in Coastal Port Cities</i> (English translation from Chinalawinfo Co., Ltd.)
C6	<i>Special Maritime Procedure Law of the People’s Republic of China</i> (English translation from Thomson Reuters)
C7	<i>Environmental Protection Law of PRC</i> (English translation from Thomson Reuters)
C8	People’s Republic of China <i>Marine Environment Protection Law</i> (English translation from Thomson Reuters)
C9	People’s Republic of China <i>Tort Law</i> (English translation from Chinalawinfo Co., Ltd.)

<b>D</b>	<b>Declaration of Jacque deLisle, Professor of Political Science, Director of the Center for East Asian Studies and Deputy Director of the Center for the Study of Contemporary China at the University of Pennsylvania</b>
D1	Curriculum vitae of Professor Jacques deLisle

Respectfully submitted,

/s/ Martin D. Beirne

**Martin D. Beirne**

Texas Bar No. 02055000

Southern District of Texas No. 3120

1300 Post Oak Boulevard, Suite 2500

Houston, Texas 77056

Tel. (713) 623-0887

Fax (713) 960-1527

**ATTORNEY IN CHARGE FOR DEFENDANT  
CONOCOPHILLIPS COMPANY**

**Of Counsel:**

BEIRNE, MAYNARD & PARSONS, L.L.P.

**David A. Pluchinsky**

Texas Bar No. 16074400

Southern District of Texas No. 9159

**Darin L. Brooks**

Texas Bar No. 00796252

Southern District of Texas No. 22788

**Kristen W. Kelly**

Texas Bar No. 24046198

Southern District of Texas No. 690180

1300 Post Oak Boulevard, Suite 2500

Houston, Texas 77056

Tel. (713) 623-0887

Fax (713) 960-1527

**Of Counsel:**

KIRKLAND & ELLIS LLP

**Brant W. Bishop, P.C.**

Southern District of Texas No. 724895

**Patrick Bryan**

**Of Counsel:**

BARTLIT BECK HERMAN PALENCHAR & SCOTT LLP

**Sean C. Grimsley**

Southern District of Texas No. 1561634

**Glen E. Summers**

Southern District of Texas No. 598585

**Dan Brody**

Southern District of Texas No. 37820

1899 Wynkoop Street, Suite 800

Denver, Colorado 80202

Tel. (303) 592-3100

Fax (303) 592-3140

Southern District of Texas No. 1572792

**Emily P. Hughes**

Southern District of Texas No. 1572784

655 Fifteenth St., N.W.

Washington, D.C. 20005

Tel. (202) 879-5000

Fax (202) 879-5200

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of September 2012, a true and correct copy of the foregoing instrument was forwarded to the following counsel-of-record via certified mail, return receipt requested.

Thomas E. Bilek  
Kelly Cox Bilek  
THE BILEK LAW FIRM, L.L.P.  
808 Travis, Suite 802  
Houston, TX 77002

Stuart H. Smith  
Michael G. Stag  
John L. Fontenot  
Sean Cassidy  
SMITH STAG, L.L.C.  
365 Canal Street, Suite 2850  
New Orleans, LA 70130

/s/ Darin L. Brooks

Darin L. Brooks